REMARKS

Status of Application

By this amendment, all pending claims have been amended to further clarify the claimed subject matter. Claims 13, 30, 35-36, and 39-40 are canceled. Claims 43-48 are added. No new matter has been added. Therefore, Claims 1-12, 14-29, 31-34, 37-38, and 41-48 are pending in the application. A Request for Continued Examination (RCE) is filed concurrently.

Summary of Examiner Interview

Applicants thank the Examiner for the Interview conducted on February 26, 2009. The interview was between Examiner Nicholas Taylor and Applicants' attorney, Adam C. Stone. Pending Claim 1 that was rejected in the Office Action was discussed along with U.S. Patent No. 6,947,725 issued to *Aura*. In particular, the discussion focused on the following: the 102 rejections of Claim 1 and the Applicant's proposed amendment to Claim 1. Agreement was reached that the proposed amendment overcomes the rejection of Claim 1 based on *Aura*. The Applicant is providing herein substantially the amendment that was proposed during the interview.

Issues Relating to Prior Art

Claims 1, 2, 4, 6, 7, 10-12, 14, 15, 17-19, 21, 23-24, 27-29, 31-32, 34, 37, 38, and 41-42 were rejected under 35 U.S.C. § 102(e) as being allegedly anticipated by U.S. Patent No. 6,947,725 ("*Aura*"). Claims 3 and 20 were rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over *Aura* and U.S. Publication 2003/0035409 ("*Wang*"). Claims 5, 8, 9, 13, 16, 22, 25, 26, 30, 33, 35, 36, 39 and 40 were rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over *Aura* and U.S. Publication 2002/0046277 ("*Barna*"). Applicants respectfully traverse the rejections.

CLAIM 1

Present Claims 1 recites:

A computer-implemented method for improving service accounting in a network, the method comprising the steps of:

in response to a first Authentication, Authorization, and Accounting (AAA) server

> receiving a request to authorize a client,

> said first server obtaining an accounting record for the client and

> said first server sending a Remote Authentication Dial In User Service protocol

>> (RADIUS) access accept message that includes at least a portion of the

>> accounting record within the access accept message;

causing at least a portion the accounting record to be logged;

a second AAA server receiving a RADIUS start session message that includes at least a

> portion the accounting record within the start session message.

In rejecting Claim 1 under 35 U.S.C. § 102, the Office Action incorrectly equates the "credential" of *Aura* with the claimed "accounting record". The Office Action is incorrect at least because *Aura* does not describe sending the credential in a Remote Authentication Dial In User Service protocol (RADIUS) access accept message and does not describe receiving the credential in a RADIUS start session message. Furthermore, one skilled in the art would not reasonably equate the credential of *Aura* with the claimed "accounting record". Consequently, *Aura* does not anticipate Claim 1.

1. <u>*Aura* does not describe sending a credential in a RADIUS access accept message and does not describe receiving a credential in a RADIUS start session message.</u>

Aura describes a method for minimizing authentication delay as a mobile node moves between operational zones of multiple network access points or base stations. (*Aura*, Abstract.) To reduce authentication delay, the mobile node receives a credential from a first base station in response to being fully authenticated by the first base station. Thereafter, as the mobile node moves between other base stations, the mobile node transmits the credential to the other base stations where the credential is used by the other base stations to establish "trust" with the mobile node in lieu of performing a full authentication. (*Id.*)

Aura does not satisfy at least the "sending a RADIUS access accept message" feature and the "receiving a RADIUS start session message feature" of Claim 1. While *Aura* describes communicating a credential over a network between a mobile node and a base station, *Aura* does

not describe or in any way suggest that communicating between the mobile node and the base station is performed using the RADIUS network protocol. Therefore, *Aura* does not disclose each and every feature of Claim 1, in as complete detail as featured in Claim 1.

Further, there is no teaching, suggestion, or motivation in *Aura* that would lead a skilled artisan to implement the network communication for exchanging the credential between a mobile node and a base station using the RADIUS network protocol. In particular, nothing in *Aura* provides any suggestion that the credential of *Aura* could be sent in a RADIUS access accept message and received in a RADIUS start session message. Consequently, it would be clear error to reject Claim 1 in light of *Aura*.

Rejecting Claim 1 as obvious in light of *Aura* and another reference, which does not describe "said first server sending a Remote Authentication Dial In User Service protocol (RADIUS) access accept message that includes at least a portion of the accounting record within the access accept message" as featured in Claim 1, or does not describe "a second AAA server receiving a RADIUS start session message that includes at least a portion the accounting record within the starts session message" as featured in Claim 1, would also constitute clear error. A clear error would arise because the combination of *Aura* and that other reference would not satisfy Claim 1 taken as a whole.

For example, while *Barna* cited in the Office Action describes an accounting request start message received by an AAA server (see message 28 in Figure 2 of *Barna*), nothing in *Barna* describes the accounting request start message including anything like the claimed "accounting record." Therefore, the combination of *Aura* and *Barna* would not satisfy Claim 1 taken as a whole because the combination would not satisfy at least "a second AAA server receiving a RADIUS start session message that includes at least a portion the accounting record within the start session message" as featured in Claim 1.

2. <u>One skilled in the art would not reasonably equate the credential of *Aura* with an accounting record.</u>

The term "accounting record" has a specific meaning that one skilled in the art would not reasonably equate with a cryptographic-based credential like the credential of *Aura*. For

example, Applicants' Specification states in paragraph [0044], "[i]various embodiments, an accounting record includes name, date, or other information appropriate for logging. In various embodiments, the accounting record comprises all of the information that an AAA server used to make an authorization decision, a handle or reference to information appropriate for logging, or a reference to all of the information that the AAA server used to make the authorization decision." A cryptographic-based credential is not appropriate for logging because a logged credential could be read from the log by an unauthorized user and surreptitiously "replayed" by the user to gain unauthorized access.

Further, the encrypted form of the credential makes logging the credential practically useless because the encrypted form is unintelligible to a human reader. For example, *Aura* describes cryptographically signing and/or encrypting a credential which one skilled in the art would recognize as producing a combination of printable and unprintable byte values (e.g., a 16-byte random number that comprises printable and unprintable bytes).

Unlike an accounting record stored in log which can include a human readable name and date and thus provide useful information to a user reading the log, a cryptographic-based credential like that in *Aura* would not provide useful information to a user reading the log because the credential would likely contain unprintable bytes. And even if all the bytes of the credential were printable, the printed credential would appear to be nothing more than a random sequence of printable characters unintelligible to the user.

Because a cryptographic-based credential is not appropriate for logging and because the encrypted form of the credential makes logging the credential practically useless, Applicants respectfully submit that one skilled in the art would not equate the credential of *Aura* with the claimed "accounting record."

Based on the foregoing Applicants' respectfully submit that Claim 1 is patentable over the *Aura*. Claims 15, 18, and 32 recite similar features and are allowable over *Aura* for the same reasons.

Remaining claims

The pending claims not discussed so far are dependant claims that depend on an independent claim that is discussed above. Because each dependant claim includes the features of claims upon which they depend, the dependant claims are patentable for at least those reasons the claims upon which the dependant claims depend are patentable. Removal of the rejections with respect to the dependant claims and allowance of the dependant claims is respectfully requested.

In addition, the dependent claims introduce additional features that independently render them patentable. Due to the fundamental differences already identified, a separate discussion of those features is not included at this time.

Conclusions

For the reasons set forth above, it is respectfully submitted that all of the pending claims are now in condition for allowance. Therefore, the issuance of a formal Notice of Allowance is believed next in order, and that action is most earnestly solicited.

The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

Please charge any shortages or credit any overages to Deposit Account No. 50-1302.

Respectfully submitted,

Hickman Palermo Truong & Becker LLP

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